

a processor coupled to the memory to compare the property of two frames to each other and to generate the output signal in response to the property of the two frames differing by a predetermined amount, wherein the difference between the two frames is determined by comparing a weighted average of brightness for the two frames.

Thus, Applicants claim using a weighted average brightness measure to determine motion. Claim 22 similarly recites using a weighted average brightness to determine motion.

*Brown* discloses inverting a frame and subtracting the inverted frame from a subsequent frame to determine a difference between frames. See col. 4, lines 35-60. Thus, *Brown* does not specifically disclose use of brightness to determine motion. Therefore, *Brown* does not anticipate the invention as claimed in claims 15 and 22.

Claims 16 and 18-21 depends from claim 15. Claims 23 and 24 depend from claim 22. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 16, 18-21, 23 and 24 are not anticipated by *Brown* for at least the reasons set forth with respect to claims 15 and 22.

#### Claim Rejections - 35 U.S.C. § 103

Claim 17 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Brown*. As noted in the Office Action *Brown* fails to disclose that the electronic device controlled by a video camera is a compute system. However, as discussed above, *Brown* fails to disclose that motion detection as claimed. Therefore, *Brown* does not render the invention as claimed in claim 17 obvious.

Claims 29-32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,631,701 issued to *Miyake* in view of *Brown*. Claims 30 and 31 have

been canceled without prejudice. Therefore, the rejection of claims 30 and 31 under 35 U.S.C. § 103(a) is moot. For at least the reasons set forth below, Applicants submit that claims 29 and 32 are not rendered obvious by *Miyake* and *Brown*.

As mentioned above, *Brown* does not disclose determining motion by weighted average brightness. *Miyake* does not disclose a video camera. Therefore *Miyake* does not cure the deficiencies of *Brown*. Thus, no combination of *Miyake* and *Brown* teaches or suggests the invention as claimed in claim 29.

Claim 32 depends from claim 29. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claim 32 is not rendered obvious by *Miyake* and *Brown* for at least the reasons set forth with respect to claim 29.

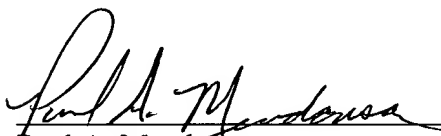
#### Conclusion

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 15-24, 29 and 32 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account  
number 02-2666.

Respectfully submitted,  
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